



08/07/2024

CT Log Number 547049464

Service of Process Transmittal Summary

TO: Legal Sop
Lyft, Inc.
185 BERRY ST STE 400
SAN FRANCISCO, CA 94107-1725

RE: Process Served in North Dakota

FOR: Lyft, Inc. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: [REDACTED] // To: Lyft, Inc.

DOCUMENT(S) SERVED: Summons, Complaint, Demand for Jury Trial

COURT/AGENCY: Burleigh County District Court, South Central Judicial Division, ND
Case # None Specified

NATURE OF ACTION: Personal Injury - Vehicle Collision - 08/29/2018

PROCESS SERVED ON: C T Corporation System, Bismarck, ND

DATE/METHOD OF SERVICE: By Process Server on 08/07/2024 at 12:22

JURISDICTION SERVED: North Dakota

APPEARANCE OR ANSWER DUE: Within 21 days after the service of this Summons upon you, exclusive of the day of service

ATTORNEY(S)/SENDER(S): Jeffrey S. Weikum
Weikum Law, PLLC
2000 Schafer Street, Suite C
Bismarck, ND 58501
701-354-0124

ACTION ITEMS: CT has retained the current log, Retain Date: 08/08/2024, Expected Purge Date: 08/13/2024

Image SOP

Email Notification, John Pellegrini jpellegrini@lyft.com

Email Notification, Christopher Youngblood cyoungblood@lyft.com

Email Notification, Eboni James ebonijames@lyft.com

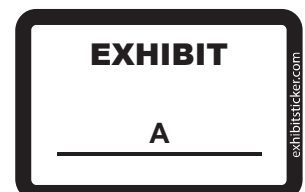
Email Notification, Ty Lim tlim@lyft.com

Email Notification, Devin Armstrong devina@lyft.com

Email Notification, Legal Sop legal-sop@lyft.com

Email Notification, Zermani Kadiam zkadiam@lyft.com

REGISTERED AGENT CONTACT: C T Corporation System
120 W Sweet Ave.





CT Corporation
Service of Process Notification

08/07/2024

CT Log Number 547049464

Bismarck, ND 58504
877-564-7529
MajorAccountTeam2@wolterskluwer.com

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PROCESS SERVER DELIVERY DETAILS

Date: Wed, Aug 7, 2024
Server Name: Drop Service

Entity Served	Lyft. Inc. (dba Lyft Drives North Dakota, Inc.)
Case Number	NA
Jurisdiction	ND

Inserts		



STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF BURLEIGH

SOUTH CENTRAL JUDICIAL DISTRICT

<div>██████████,</div> <div>Plaintiff,</div> <div>v.</div> <div>Lyft, Inc. (d/b/a Lyft Drives North Dakota, Inc.)</div> <div>Defendant.</div>	<div>CIVIL NO.</div>
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Summons

¶1 You are hereby summoned and required to appear and defend against the Complaint in this action, which is herewith served upon you, by serving upon the undersigned an answer or other proper response within twenty-one (21) days after the service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

(Remainder of page intentionally left blank.)

Dated this 6th day of August 2024.

WEIKUM INJURY LAW
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2000 Schafer Street, Suite C
Bismarck, ND 58501
701.354.0124
Correspondence: jeff@weikuminjurylaw.com
Service: service@weikuminjurylaw.com

By: /s/ Jeffrey S. Weikum
Jeffrey S. Weikum
ND Lic. No. 05344

ATTORNEY FOR PLAINTIFF

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF BURLEIGH

SOUTH CENTRAL JUDICIAL DISTRICT

<div>██████████,</div> <div>Plaintiff,</div> <div>v.</div> <div>Lyft, Inc. (d/b/a Lyft Drives North Dakota, Inc.)</div> <div>Defendant.</div>	CASE NO.
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Complaint

¶1 Plaintiff, by her attorney of record, for her causes of action against the above-named defendant, states and alleges as follows:

Parties

¶2 Plaintiff ██████████ (hereinafter "██████████") is currently a resident of the City of Bismarck, State of North Dakota.

¶3 Defendant, Lyft, Inc. (dba Lyft Drives North Dakota Inc.) hereinafter ("Lyft") is a Delaware corporation doing business in the State of California, with its principal place of business in the City of San Francisco, County of San Francisco, State of California, and doing business, engaging in business, and transacting business in the State of North Dakota. Defendant Additionally, Lyft is registered with the North Dakota Secretary of State and engaged in providing a ride sharing business to the public.

JURISDICTION

¶4 This Court has jurisdiction over this cause of action as all of the events giving rise to it arose in this jurisdiction. Plaintiff brings suit under the laws and statutes of the State of North Dakota to recover for the serious personal injuries sustained resulting from the defendants' actions or inactions.

Venue

¶5 Venue is proper in this Court pursuant to North Dakota Century Code § 28-04-04 and § 28-04-05 because upon information and belief the actions that form the factual background of the suit were committed within the jurisdictional boundaries of Burleigh County, near the City of Bismark, and in the State of North Dakota.

Factual Background

¶6 On or about August 29, 2018, [REDACTED] via a Lyft ride sharing app secured the services of Lyft to provide ride sharing transportation. Via the Lyft ride sharing app Lyft dispatched a Lyft driver to provide ride sharing transportation. During the transportation the Lyft driver sexually and physically assaulted [REDACTED] causing serious injuries.

¶7 [REDACTED] sustained multiple severe injuries including but not limited to physical injuries related to the sexual assault and emotional injuries directly related to the occurrence.

Causes of Action
Negligence & Respondeat Superior:

¶8 [REDACTED] repeats and incorporates by reference all other paragraphs of this complaint as if fully set forth herein.

¶9 The actions and inactions of the defendant resulted from the negligence of defendant pursuant to the theories of negligence and respondeat superior. Defendant was negligent and breached its duty to [REDACTED] at the above time and place in at least the following respects:

- A. Failing to use reasonable care to inspect and maintain a safe ride sharing transport for [REDACTED].
- B. Failing to use reasonable care to ensure that the ride share, and employees were safe;
- C. Failing to adequately warn [REDACTED] of the dangerous conditions present at the ride share.
- D. Failing to exercise its executive role in ensuring that safety procedures and policies were followed during the ride share.
- E. Failing to inspect and monitor the background and the work of its employees to ensure that proper safety policies and procedures were followed, and that the public was safe.
- F. Failing to ensure against the sexual assault and injuries [REDACTED].
- G. Failing to implement appropriate safety procedures in the operation of the ride share; and
- H. Failing to follow appropriate safety precautions safe transportation of the public including [REDACTED].

¶10 As a direct and proximate consequence of the negligence and respondent superior liability of defendant and its driver, [REDACTED] suffered permanent physical and emotional damages in an amount to be monetized at trial.

Damages

[REDACTED]

¶11 [REDACTED] repeats and incorporates by reference all other paragraphs of this complaint as if fully set forth herein.

¶12 As a direct and proximate result of defendant's negligent, and grossly negligent acts and/or omissions described above, [REDACTED] suffered substantial injuries and damages for

which they seek recovery in an amount that the jury determines to be fair and reasonable, including the following damages:

- A. **Past & Future Medical Expenses:** Plaintiff [REDACTED] incurred bodily injuries, which were caused by the incident in question and will, in reasonable probability, continue to incur reasonable and necessary medical expenses in the future.
- B. **Past & Future Physical Pain:** Plaintiff [REDACTED] suffered physical pain in the past and, in reasonable probability, will continue to sustain physical pain in the future.
- C. **Past & Future Mental Anguish:** Plaintiff [REDACTED] has endured mental anguish in the past and will, in reasonable probability, endure mental anguish in the future.
- D. **Past & Future Loss of Earning/Earning Capacity:** Plaintiff [REDACTED] has suffered a loss of earning and/or sustained a loss of earning capacity in the past and will, in reasonable probability, sustain the same in the future.
- E. **Past & Future Physical Impairment:** Plaintiff [REDACTED] sustained physical impairment in the past and will continue, in reasonable probability, to sustain physical impairment in the future.

¶13 All conditions precedent to plaintiff's right to recover the relief sought herein have occurred or have been performed.

¶14 WHEREFORE, the Plaintiff, demands judgment against the defendant, in a reasonable sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with costs and disbursements herein, including pre-judgment interest as may be allowed by applicable law and further relief as the Court may deem just and proper.

Dated this 6th day August 2024.

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By: /s/ Jeffrey S. Weikum
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ND Lic. No.: 05344

ATTORNEY FOR PLAINTIFF

STATE OF NORTH DAKOTA
COUNTY OF BURLEIGH

IN DISTRICT COURT
SOUTH CENTRAL JUDICIAL DISTRICT

<div>██████████,</div> <div>Plaintiff,</div> <div>v.</div> <div>Lyft, Inc. (d/b/a Lyft Drives North Dakota, Inc.)</div> <div>Defendant.</div>	CIVIL NO.
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Demand for Jury Trial

¶1 Plaintiff hereby demands a trial by jury consisting of the minimum number of jurors as are allowed by law.

(Remainder of this page intentionally left blank.)

Dated this 6th day of August 2024.

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